Policy Statement
The School District of Philadelphia shall produce and submit all interim grant reports, grant award closeout reports and fiscal year-end financial reports as stipulated by grantors or as required by law. Reports will accurately reflect actual programmatic activities and the actual use of grant funds as recorded in the financial records of the District and will be in compliance with the funding agency’s terms and conditions. The District will complete all reporting requirements and procedures in a timely and accurate manner.

Reason for Policy
The District is responsible for accounting for its use of both grant and non-grant funds. Fiscal year-end closing is the process of reviewing and adjusting all accounts to ensure that they accurately reflect the activities for the fiscal year. It is the final step in the accounting cycle before preparing District-wide financial statements.

Grant award closeout refers to reporting to the grantor at the end of the life of the grant. Most grantors require financial accounting of the funds expended in support of a project and in accordance with the approved budget. Programmatic reports may also be required. The timing and detail for such reports is usually specified in the award document. All of these reports provide the grantor and the District’s constituents with evidence of good fiscal stewardship.

Through the grant award and fiscal year-end closeout procedures, the District documents and assures the fulfillment of the terms and conditions of its funding sources, certifies District compliance with applicable regulations and makes final disposition of any award by-products, such as final vouchers, reports, and property inventory.

Policy Requirements
Preparation for grant award closeout and fiscal year-end closeout should begin prior to the end of the grant award period or fiscal year in order to accurately forecast expenses and to process any needed adjusting journal entries and for reviews and sign-offs. This will enable Grant Program Managers (GPMs) to understand the financial results of operations and apply for no-cost extensions or carry-forward of funds from their funding agency if necessary. At the conclusion of the grant award period and/or the end of the fiscal year, all financial, performance, and other reports required as a condition of the grant or by law must be submitted.

Any required interim, grant closeout or fiscal year-end financial or programmatic reports will be prepared accurately, on time and in accordance with applicable laws, regulations and any grant-specific terms and conditions. It is the responsibility of the Grants Fiscal Services Grant Budget Analyst (GBA) and Grant Accounting Unit (GAU) to prepare certain fiscal reports. The GPM is responsible for preparation of programmatic reports and is responsible for providing final approval on all reports submitted to a funding agency. The Office of Research and Evaluation (ORE) is responsible for providing programmatic
evaluations as may be required. Copies of reports and all supporting documentation must be maintained in accordance with District Policy GP1400 Document and Record Retention.

Of particular note is the new policy contained in the Uniform Grant Guidance for federal Awards issued on December 26, 2014 or after that requires, per 2 CFR Part 200.415, that officials authorized to legally bind the non-federal entity must certify on annual and final fiscal reports or vouchers requesting payment the following:

“By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise.”

According to federal guidance (COFAR at 415.1), it is up to the non-Federal entity to determine how best to establish the authority to legally bind the non-Federal entity. The SDP will not alter the responsibility for the processing and signature requirements for financial reports or draw-downs, but will include the statement as required. Any instance where a person refuses to sign the reports containing the statement will be subject to an immediate review by senior management.

Responsibilities
Grant Program Managers (GPMs) and Principals, in communication and coordination with Grant Fiscal Services (GFS) must ensure that prior to any financial or programmatic reporting (interim, grant award closeout, or fiscal year-end), all expenses are allowable and allocable to the grant (in accordance with District Policy GP800 Allowable Uses of Fund and Adherence to Cost Circulars) and that any required adjustments to expenses are posted in compliance with policies and procedures. GPMs are responsible for ensuring that all other requirements of the grant have been fulfilled according to the grantor’s terms and conditions. GPMs are responsible for reviewing, approving (by signature) and submitting (or delegating submission) any reports to the funding agency by the reporting deadline. GPMs shall be responsible for requesting no-cost extensions or carry-forward funding requests when needed with the support of other offices as applicable.

GFS Grant Budget Analysts (GBAs) will compile and process the grant related financial information required to prepare timely interim, fiscal year-end and grant award closeout reports. This includes reconciling receipts and disbursements, executing any requested journal vouchers (in accordance with District Policy GP1500 Journal Voucher Management), any required adjusting, closing, or reversing entries. GBAs should consult with the GPM and review the reports contents with their supervisor to ensure that all reports accurately reflect the use of grant funds. GBAs are responsible for changing the status of an award within Advantage to “Closed” to prevent further charges to the award.

Grant Accounting Unit (GAU) is responsible for accurately incorporating grant based financial information into the fiscal year-end statements. The GAU will make any necessary adjusting, closing, or reversing entries required to consolidate all grant and non-grant fund information. Any changes that would affect specific grants should be reviewed with the GPM first.

Office of Research and Evaluation shall ensure that any independent evaluations of grant results, if applicable, be completed on time and consistent with the terms of the grant agreement.
Procedures

- GP2700.1 Interim Grant Reporting
- GP27002 Fiscal Year-End Reporting
- GP2700.3 Grant Award Closeout Reporting

Forms

Definitions

Financial report is an accounting of expenditures and obligations incurred during the period of performance and/or at the conclusion of the project. The financial report reflects the District’s official accounting records.

Interim report is any financial or programmatic report that a grantor requires prior to the end of the grant period. These will be completed as directed by the grantor.

Yearly Financial Close reports are those reports produced on a District fiscal year basis in conjunction with the production of the Consolidated Annual Financial report (CAFR) and may, or may not, coincide with the Grant Award Closeout process and report.

Grant Award Closeout is the process at the end of a grant period by which the District completes any required financial or programmatic accounting to the funding agency and prevents any further expenses from being incurred on the grant.

Contacts

- Grant Fiscal Services
- Grant Accounting Unit
- Grant Compliance Office
- Office of Research and Evaluation
- Office of Grant Development

Frequently Asked Questions

Related Information

- GP1500 Journal Voucher Management
- GP800 Allowable Uses of Fund and Adherence to Cost Circulars
- GP1400 Document and Record Retention

History

Amended:

Amended on 6/4/2015 to include references to the Uniform Grant Guidance and to make technical adjustments.